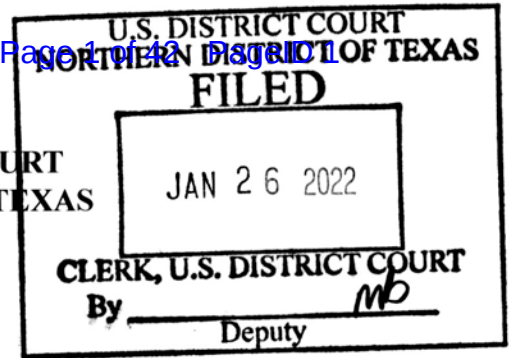


PRISONER'S CIVIL RIGHTS COMPLAINT (Rev. 05/2015)

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

MICHAEL G. PETERS #2019190

Plaintiff's Name and ID Number

Stringfellow Unit

Place of Confinement

3-23CV0198-G

CASE NO. _____
(Clerk will assign the number)

v.

TEXAS DEPT. OF CRIMINAL JUSTICE

Defendant's Name and Address

DIRECTOR, BOBBY LUMPKIN

Defendant's Name and Address

STATE OF TEXAS

Defendant's Name and Address

(DO NOT USE "ET AL.")

INSTRUCTIONS - READ CAREFULLY**NOTICE:****Your complaint is subject to dismissal unless it conforms to these instructions and this form.**

1. To start an action you must file an original and one copy of your complaint with the court. You should keep a copy of the complaint for your own records.
2. Your complaint must be legibly handwritten, in ink, or typewritten. You, the plaintiff, must sign and declare under penalty of perjury that the facts are correct. If you need additional space, **DO NOT USE THE REVERSE SIDE OR BACKSIDE OF ANY PAGE.** ATTACH AN ADDITIONAL BLANK PAGE AND WRITE ON IT.
3. You must file a separate complaint for each claim you have unless the various claims are all related to the same incident or issue or are all against the same defendant, Rule 18, Federal Rules of Civil Procedure. Make a short and plain statement of your claim, Rule 8, Federal Rules of Civil Procedure.
4. When these forms are completed, mail the original and one copy to the clerk of the United States district court for the appropriate district of Texas in the division where one or more named defendants are located, or where the incident giving rise to your claim for relief occurred. If you are confined in the Texas Department of Criminal Justice, Correctional Institutions Division (TDCJ-CID), the list labeled as "VENUE LIST" is posted in your unit law library. It is a list of the Texas prison units indicating the appropriate district court, the division and an address list of the divisional clerks.

1. In order for your complaint to be filed, it must be accompanied by the statutory filing fee of \$350.00 plus an administrative fee of \$50.00 for a total fee of **\$400.00**.
2. If you do not have the necessary funds to pay the fee in full at this time, you may request permission to proceed *in forma pauperis*. In this event you must complete the application to proceed *in forma pauperis*, setting forth information to establish your inability to prepay the fees and costs or give security therefor. You must also include a current six-month history of your inmate trust account. If you are an inmate in TDCJ-CID, you can acquire the application to proceed *in forma pauperis* and the certificate of inmate trust account, also known as *in forma pauperis* data sheet, from the law library at you prison unit.
3. The Prison Litigation Reform Act of 1995 (PLRA) provides "... if a prisoner brings a civil action or files an appeal *in forma pauperis*, the prisoner shall be required to pay the full amount of a filing fee." See 28 U.S.C. § 1915. Thus, the court is required to assess and, when funds exist, collect, the entire filing fee or a initial partial filing fee and monthly installments until the entire amount of the filing fee has been paid by the prisoner. If you submit the application to proceed *in forma pauperis*, the court will apply 28 U.S.C. § 1915 and, if appropriate, assess and collect the entire filing fee or an initial partial filing fee, then monthly installments from you inmate trust account, until the entire \$350.00 statutory filing fee has been paid. (The \$50.00 administrative fee does not apply to cases proceeding *in forma pauperis*.)
4. If you intend to seek *in forma pauperis* status, do not send your complaint without an application to proceed *in forma pauperis* and the certificate of inmate trust account. Complete all essential paperwork before submitting it to the court.

CHANGE OF ADDRESS

It is your responsibility to inform the court of any change of address and its effective date. Such notice should be marked "**NOTICE TO THE COURT OF CHANGE OF ADDRESS**" and shall not include any motion for any other relief. Failure to file a NOTICE OF THE COURT OF CHANGE OF ADDRESS may result in the dismissal of your complaint pursuant to Rule 41(b), Federal Rules of Civil Procedure.

I. PREVIOUS LAWSUITS:

- A. Have you filed *any* other lawsuit in state or federal court relating to your imprisonment? X YES NO
- B. If your answer to "A" is "yes", describe each lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, giving the same information.)
 1. Approximate date of filing lawsuit: UNKNOWN
 2. Parties to previous lawsuit:
Plaintiff(s) MICHAEL G. PETERS
Defendant(s) STATE OF TEXAS
 3. Court: (If federal, name the district; if state, name the county.) U.S. SOUTHERN
 4. Cause number: UNKNOWN
 5. Name of judge to whom case was assigned: UNKNOWN
 6. Disposition: (Was the case dismissed, appealed, still pending?) PENDING
 7. Approximate date of disposition: UNKNOWN

II. PLACE OF PRESENT CONFINEMENT: STRINGFELLOW UNIT

III. EXHAUSTION OF GRIEVANCE PROCEDURES:

Have you exhausted all steps of the institutional grievance procedure? X YES NO
Attach a copy of your final step of the grievance procedure with the response supplied by the institution.

IV. PARTIES TO THIS SUIT:

A. Name and address of plaintiff: MICHAEL G. PETERS #2019190
1200 FM 655
ROSHARON, TEXAS 77583

B. Full name of each defendant, his official position, his place of employment, and his full mailing address.

Defendant #1: TEXAS DEPT. OF CRIMINAL JUSTICE AND BRIAN COLLIER

Briefly describe the act(s) or omission(s) of this defendant which you claimed harmed you.

VIOLATED MY R.L.U.I.P.A. AND CONSTITUTIONAL RIGHTS TO RELIGIOUS EX-
ERCISE, AND FORCED FASTINGS. DISCRIMINATION.

Defendant #2: T.D.C.J. DIRECTOR: BOBBY LUMKIN

Briefly describe the acts(s) or omission(s) of this defendant which you claimed harmed you.

VIOLATED MY R.L.U.I.P.A. AND CONSTITUTIONAL RIGHTS TO RELIGIOUS EX-
ERCISE, AND FORCED FASTINGS. DISCRIMINATION

Defendant #3: STATEOF TEXAS

Briefly describe the acts(s) or omission(s) of this defendant which you claimed harmed you.

VIOLATED MY R.L.U.I.P.A. AND CONSTITUTIONALRIGHTS TO RELIGIOUS EX-
ERCISE, AND FORCED FASTINGS. DISCRIMINATION

Defendant #4: RABBI DOVID GOLDSTEIN [CHABAD OUTREACH] 11000 FONDERN,
SUITE NO. B-104, HOUSTON, TEXAS 77096 (713) 774-0300

Briefly describe the act(s) or omission(s) of this defendant which you claimed harmed you.

VIOLATED MY R.L.U.I.P.A. AND CONSTITUTIONAL RIGHTS TO RELIGIOUS EX-
ERCISE, AND FORCED FASTINGS. DISCRIMINATION

Defendant #5: STRINGFELLOW UNIT CHAPLAIN [HIGHTOWER]

Briefly describe the act(s) or omission(s) of this defendant which you claimed harmed you.

VIOLATED MY R.L.U.I.P.A. AND CONSTITUTIONAL RIGHTS TO RELIGIOUS EX-
ERCISE, AND FORCED FASTINGD. DISCRIMINATION

V. STATEMENT OF CLAIM:

State here in a short and plain statement the facts of your case, that is, what happened, where did it happen, when did it happen, and who was involved. Describe how each defendant is involved. You need not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Attach extra pages if necessary, but remember the complaint must be stated briefly and concisely. IF YOU VIOLATE THIS RULE, THE COURT MAY STRIKE YOUR COMPLAINT.

The Plaintiff seeks [Relief of Litigants] against the Defendant(s) to hold in contempt and enforcement against the defendant(s) and it's agents the judgement of Moussazadeh, 709 F.3d 487; (2013) U.S. App. LEXIS 8529: See Cruz vs. Beto, 405 U.S. 319, 322 n.2 92 S.Ct. 11079; Washington vs. Klem, 497 F.3d at 280; accord Lovelace vs. Lee, 472 F. 3d 174, 187; Jolly vs. Coughlin, 76 F.3d 468, 477 (quoting) Thomas vs. Review Board of Indiana Employment Serv. Division, 450 U.S. 707, 718, 101 S. Ct. 1425 [First Amendment Case]; accord vision Church vs. Village of Long Grove, 468 F. 3d 975, 997, cert. denied, 128 S. Ct. 77:

See Attached:

VI. RELIEF:

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

Award damages; order a D.N.A. test; order T.D.C.J. to grant entry into the Jewish Program and order Plaintiff's lineage to prove he is Jewish.

Allow the purchase of tennis shoes, and stop forced fastings.

VII. GENERAL BACKGROUND INFORMATION:

A. State, in complete form, all names you have ever used or been known by including any and all aliases.
unknown

B. List all TDCJ-CID identificaiton numbers you have ever been assigned and all other state or federal prison or FBI numbers ever assigned to you.

2019190, unknown

VIII. SANCTIONS:

A. Have you been sanctioned by any court as a result of any lawsuit you have filed? ☒ YES ☐ NO

B. If your answer is "yes," give the following information for every lawsuit in which sanctions were imposed. (If more than one, use another piece of paper and answer the same questions.)

1. Court that imposed sanctions (if federal, give the district and division): U.S. Southern

2. Case number: unknown

3. Approximate date sanctions were imposed: unknown

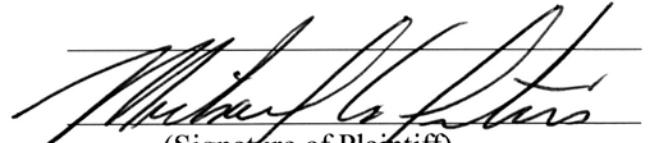
4. Have the sanctions been lifted or otherwise satisfied? ☒ YES ☐ NO

C. Has any court ever warned or notified you that sanctions could be imposed? X YES NO

D. If your answer is "yes," give the following information for every lawsuit in which a warning was issued. (If more than one, use another piece of paper and answer the same questions.)

1. Court that issued warning (if federal, give the district and division): U.S. Southern
2. Case number: unknown
3. Approximate date warning was issued: unknown

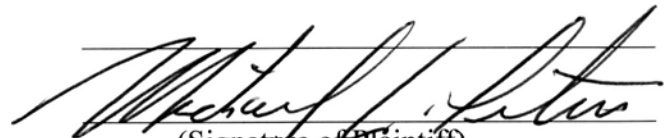
Executed on: 01-01-23
DATE


(Signature of Plaintiff)

PLAINTIFF'S DECLARATIONS

1. I declare under penalty of perjury all facts presented in this complaint and attachments thereto are true and correct.
2. I understand, if I am released or transferred, it is my responsibility to keep the court informed of my current mailing address and failure to do so may result in the dismissal of this lawsuit.
3. I understand I must exhaust all available administrative remedies prior to filing this lawsuit.
4. I understand I am prohibited from bringing an *in forma pauperis* lawsuit if I have brought three or more civil actions or appeals (from a judgment in a civil action) in a court of the United States while incarcerated or detained in any facility, which lawsuits were dismissed on the ground they were frivolous, malicious, or failed to state a claim upon which relief may be granted, unless I am under imminent danger of serious physical injury.
5. I understand even if I am allowed to proceed without prepayment of costs, I am responsible for the entire filing fee and costs assessed by the court, which shall be deducted in accordance with the law from my inmate trust account by my custodian until the filing fee is paid.

Signed this 15 day of January, 2023.
(Day) (month) (year)


(Signature of Plaintiff)

WARNING: Plaintiff is advised any false or deliberately misleading information provided in response to the above questions may result in the imposition of sanctions. The sanctions the court may impose include, but are not limited to, monetary sanctions and the dismissal of this action with prejudice.

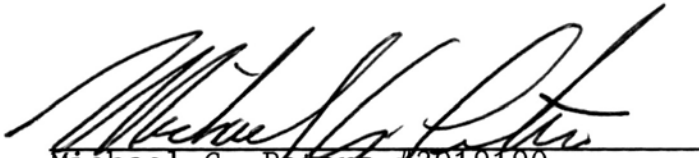
CERTIFICATE OF SERVICE

Comes now the Plaintiff; MICHAEL GEOFFREY PETERS who states that a true and correct copy of this 1983 Civil Action was send to the Defendant(s) via their attorney; KEN PAXTON at the following address:

Texas Attorney General's Office
C/O KEN PAXTON
P.O. Box 12548
Austin, Texas 78711-2548

All Defendant(s) are agents of the State of Texas and are mentioned in said Civil Action as Defendant(s) in this action, and were notified on January 1, 2023.

Respectfully submitted



Michael G. Peters #2019190

DATED: January 5, 2023

MICHAEL GEOFFREY PETERS NO 2019190
STRINGFELLOW UNIT
1200 FM 655
ROSHARON, TEXAS 77583

ATTACHED

Midrash and Sephard Inc. vs. Town of Surfside, 366 F.3d 1214, 1227, pertaining to "Substantial Burdens" on Religious rights. Plaintiff asserts that in accordance with 18 U.S.C. Sec. 401; Power of Courts (1),(2) & (3), the Court has inherent power to enforce compliance with [its] lawful orders through Civil Contempt and Criminal Contempt laws. See: 18 U.S.C. 402 Contempts constituting crimes in conjunction with Rule 70 enforcing a judgement for:

(a) Party's failure to act, ordering another to act.

(b) Holding in Contempt.

Plaintiff asserts that per 18 U.S.C. Sec. 3626 (a)(1)(B)(i-iii)(c)(2), to prevail on motion for civil contempt. The Movant must prove by clear and convincing evidence that the non-Movant violated a Court Order. See: Jones - ELV Berge, 374 F.3d 541, 545; Marion County Jail Inmates vs. Anderson, 270 F. Supp. 2d 1034, 1036-37 cf: eg. Hadix, 465 F. Supp. 2d 776 (2006) U.S. Dist. LEXIS 88696 F.T.C.V. Kuykendall, 371 F.3d 745 American Rivers et.al vs. Army Corps of Engineering, 274 F. Supp. 2d 62.

I.

Plaintiff further asserts Rule 70(a) Fed. R. Civ. P. provides that if a Party fails to preform a specific act required by a judgement the Court may order the act to be done at the disobedient parties expense by another person appointed by the Court. Gilbert vs. Johnson, 718 F. 2d 1350. See also: Gary W. vs. State of La., 622 F. 2d 804, 806, citing; Gates vs. Collier, 616 F.2d 1268. Hence Civil remedies serve two purposes:

- (1) To coerce the judgement violator(s) into compliance with the Court Order and/or
- (2) To compensate a party for losses or damages caused by the others Party's violation of the order.

(1).

See: Int'l Union of United Mine Workers of Am vs. Bagwell, 512 U.S. 821, 829, 114 S.Ct 2552; U.s. vs. United Mine Workers, 330 U.S. 258. 303-04, 67 S. Ct 677. Courts have broad discretion to enter orders to make sure a prior order is carried out or it's purposes are accomplished. McComb vs. Jacksonville Paper Company, 336 U.S. 187, 193-94, 69 S.Ct 497; EEOC vs. Local 580 International Assn. of Bridge Structure and Ornamental iron Workers, 925 F. 2d 588, 595; Carty vs. Turnbull, 144 F. Supp. 2d 395, 418. See: Newman vs. State of Alabama, 683 F. 2d 1312 (11th Cir. 1982) quoting that non complying party's may be imprisoned.

II.

FACTUAL PROCEDURAL HISTORY OF THE CASE

Plaintiff asserts that upon his induction and incarceration into the Texas Dept. of Criminal Justice he made it known to prison staff when asked his religion that he was ["Jewish"] by faith and race. This was assigned to the plaintiff's [Travel Card] and put into his perminant prison file. At no time in the Plaintiff's incarceration has he ever been allowed to exercise or pratice his religious tenets. He was forced to sue the Texas Dept. of criminal Justice for ("Kosher") meals, Case No. 6:17-cv-595 and was ordered transfered to the Stringfellow Unit where the Kosher Kitchen is located. The original civil action entailed both meals and Religious Services but was later ammemded without plaintiff knowing to just meals.

III.

The Stringfellow Rabbi, Dovid Goldstein strickly forbid the plaintiff from joining the ["Jewish Program"] as he had not proven he was a jew. This violated plaintiff's Constitutional First Amendment rights as well as his religious rights under the Religious Land Use and Institutional Persons Act [R.L.U.I.P.A.]. The Plaintiff does not have family on the out side of the prison and thus nobody to aid or help him present the proof or evidence that he is jewish.

IV.

The Plaintiff asserts that he is jewish both by religious pratice and by blood he is of the Jewish race of people, thus entitling him to Isreal/citizenship under Jewish laws. At the Stringfellow Unit there are currantly fourteen (14) members of the Jewish Community and only half are Jewish. Rabbi Goldstein has hand selected some to be member's he thinks will later convert to Judisum. No conversions are done at the prison level. By rights both due to my lineage and Jewish blood as well as under the R.L.U.I.P.A. and the First Amendmant to the U.S. Constitution the Plaintiff has an inherent right to not only "be" jewish but also to pratice and exercise his Jewish Religious tenets.

V.

The Plaintiff has suffered for eight and ahalf (8-1/2) years without being allowed to participate or pratice his religion. This in part is due to Plaintiff's ["Actual Innocence"] and being a Texas State Political Prisoner; one who must be silenced and the Anti-Semitism of the state and it's agents. Rabbi Goldstein is an (Orthodox) jew while the Plaintiff is an Ashkenazic (Reform) jew. Rabbi Goldstein wants everyone in the Jewish Program to be Orthodox. The prejudice of the defendant(s) toward the Plaintiff can be seen by the fact only half the Jewish Program under Rabbi Goldstein are jewish and even though Plaintiff is Jewish by blood and race, he is discriminated against because he was forced to file a civil action for kosher meals in Rabbi Goldstein's Jewish Program and he took offense to it. Again the Plaintiff had to file a civil action to Religious Services in Supreme Court cases: #21-40483 and #21-20444 both dismissed due to political reasons.

VI.

The Plaintiff also asserts that the defendant(s) Per Policy and Procedures have created a "Substancial Burden" on the exercise of the Plaintiff's Religious Freedom and violated his First Amendment

to the United States Constitution and 42 U.S.C. Sec. 2000 cc et.seq. Plaintiff was barred participating in all Jewish tenets for the past eight and a half (8-1/2) years and was forced to seek psychological help due to severe depression and has been taking medications to help control depression brought on by his ("Actual Innocence") and denial of all rights to practice his religion at a time of induce helplessness and dispare. The denial of Plaintiff's Constitutional rights to practice his religion compounded his pain and sufferings due to his intentional wrongful imprisonment to have him silenced for exposing political crimes and collusion by [X3] and has caused his mental and emotional anguish and sufferings that have affected his physical condition and mental health.

VII.

The Defendant(s) discrimination against the Plaintiff has endangered his health and mental state as well as caused his depression that has been compounded by [X3] due to the violations of his Religious rights. See: T.D.C.J. Travel Card and T.D.C.J. Chaplaincy Jewish umbrella. A (minyan) is not possible as per Jewish law and tradition. The (weekly) Sabbath and Annual convocation involves Torah and a Minyan in which a gathering of no less than ten (10) persons over the age of thirteen (13) of Jewish faith must gather. Without both Torah and a Minyan "any service" that would be provided for Jewish believers is characterized as "nothing."

VIII.

The Pesch Sedar is a family celebration of great religious significance to believers in the Jewish faith. In the sense that concepts of community and family are central to Judaism. See: Whitney vs. Brown, 882, F. 2d 1068. Further the Plaintiff has been denied all Jewish Holy day celebrations for the past (8-1/2) years. This includes but is not limited to the following:

1. Fast of 10th of Tevet (12-14-2021)
2. TuB' Shevat (01-17-2022)

3. Fast of Esther (03-16-2022)
4. Purim (03-17-2022)
5. Fast of the Firstborn (04-15-2022)
6. Passover (04-16-17-2022)
7. LagBe' Qmer (05-19-2022)
8. Shavot (06-5-6-2022)
9. Fast of the 17th of Tammuz (05-17-2022)
10. Fast of the 9th of Av. (08-07-2022)
11. Rosh Hashanah (09-26-27-2022)
12. Fast of Gedalish (09-28-2022)
13. Yom Kippur (09-25-2022)
14. Sukkot (10-11-2022)
15. Shemini Atzeret (10-17-2022)
16. Simchat Torah (10-18-2022)
17. Chanukah (12-19-26-2022)

At no time has the Defendant(s) recognized the Plaintiff's Jewish Religious rights to attend, practice or celebrate any of these tenets. Their denial of the Plaintiff's Religious rights has continued from day to day and from year to year for the past eight and a half (8-1/2) years, causing the Plaintiff to grieve and suffer daily and has severely impacted his unjust punishments, suffering and mental and emotional anguish which has resulted in Plaintiff's taking antidepressants and having to consult with the Stringfellow Unit's Psychiatrist.

IX.

R.L.U.I.P.A.

RELIGIOUS LAND USE AND INSTITUTIONALIZED PERSONS ACT

The Plaintiff further asserts that the Court decree of 826 F.3d 285 (quoting)(Cutter vs. Wilkenson, 544 U.S. 709, 716-17, 125 S. Ct 2113, 161 L. Ed 2d 1020 Congress enacted the R.L.U.I.P.A. to address "frivolous or arbitrary barriers" impeding institutionalized persons religious exercise, but expected courts entertaining the R.L.U.I.P.A. challenges to also accord due difference to the experience and expertise of Prison and Jail Administrators; (quoting) 146

Congress Rec.16696, 16699 (2000)(Joint Statement of Senators Hatch and Kennedy on R.L.U.I.P.A. Religious Accommodations must not override other significant interests in maintaining order and safety. Courts should give deference to prison officials in establishing necessary regulations and procedures to maintain good order, security and discipline consistent with considerations and costs and limited resources; ID at 773.

X.

The Plaintiff agrees, however the deference is not unlimited and policies grounded on mere speculation, exaggerations and fear or post-hoc realizations will not suffice to meet the Acts Requirement. See: e.g. Rich vs. Ser'v Florida Dept. of Corr., 716, F.3d 525, 533 (11th Cir. 2013)(quoting) 2016 U.S. App. LEXIS 715 Rep. No. 103-111 of the Religious Freedom Restoration Act (R.F.R.A.) predecessor to R.L.U.I.P.A.; See also: Holt vs. Hobbs, 135 S. Ct 853, 867, 170 L. Ed 747 (2015)("indeed prison policies grounded on mere speculation are exactly the ones that motivated Congress to enact R.L.U.I.P.A.. See: Tucker vs. Collier, 906 F. 3d 295, 2018 U.S. App. LEXIS 28028 No. 15-41643.

XI.

Plaintiff asserts that through the years of incarceration he has incurred, he has made diligent and continues efforts to secure his Religious Exercise Constitutional and R.L.U.I.P.A. rights and has met continued and sustained resistance due to the bias and prejudice and Anti-Semitic behavior of the defendant(s) to punish him for being a Greek / Jew and Political Prisoner. S. Ct. Cases No. 20-8406, 21-40487 and 21-20444 have all been dismissed due to plaintiff's knowledge of political crimes committed by Gov. Rick Perry and Gov. Gregg Abbott. This G.O.P. cover-up has sustained a continued bias and state of punishment towards the plaintiff by the government to the extent that ["all"] plaintiff's constitutional rights have been denied him repeatedly over the course of eight and a half (8-1/2) years, which has resulted in his extreme mental anguish and emotional distress.

The Defendant(s) all knowing of the plaintiff's innocence as well as the fact he's always asserted he was Jewish, made no efforts to correct, aid or help the plaintiff to prove his lineage or Jewish race. The Defendant(s) simply continued to inflict their bias and prejudice against the plaintiff and did everything in their power to harm him and stop him from exercising his constitutional rights to practice his Jewish Religion and tenets. They continued to deny him all Holy Days and Celebrations, while simultaneously allowing non-Jews to attend who never had to prove their lineage or bloodline and knew they were not Jewish or Converted. This discrimination and cruel and unusual punishment has irreparably harmed the Plaintiff who states that he will never be the same, and never trust another Jewish person as long as he lives.

XII.

PART "B" DISCRIMINATION

Further the Plaintiff asserts that the defendant(s) with the exception of Rabbi Goldstein, the defendant(s):

Have stopped selling footwear (tennis shoes) in the Inmate Commissary for many months. T.D.C.J. staff allow that Inmates who have family on the outside can purchase tennis shoes and have them sent through the Company to the respective Inmate. The Defendant(s) will not allow the Plaintiff to purchase his own tennis shoes via a catalog. This discriminates against the Plaintiff as he has no family member on the outside to facilitate a purchase of tennis shoes for him. His tennis shoes have been destroyed due to use and age. It is discrimination to allow one Inmate a way to purchase tennis shoes and deny Plaintiff any ways or means to purchase a pair as well. This type of discrimination is typical of the way in which the defendant(s) have been treating the Plaintiff due to his being a Political Prisoner and Jewish. The Plaintiff has continued to suffer under the continued oppression caused by the Defendant(s) bias and Anti-Semitism. The Plaintiff now seeks relief for the torture and cruel and unusual punishment(s) inflicted over the years and from the abuses inflicted by the Defendant(s) hatred towards him.

PART "A" DISCRIMINATION

Texas Dept. of Criminal Justice [T.D.C.J.] Contractor(s) Rabbi Goldstein and Stringfellow Chaplain Robert K. Hightower reasonably should be aware of the departments religious programming and policies. Executive Directive 07.29 (rev.3) Dated Nov. 1, 2018. Authority: Tex. Gov't Code Sec. 493.001, 493.006(b), 501.001; Tex. S.C.R. 44, 75 Leg., R.S. 1997; BP-02.08: Statement of Internal Controls.

POLICY: This directive establishes the T.D.C.J. policy statement for participation in religious programs for inmates supervised by or incarcerated in a T.D.C.J. operated or contracted for the use of religious activities and programs that promote public welfare. The T.D.C.J. extends to [A]ll inmates currantly supervised by or incarcerated in a T.D.C.J. operated or contracted facility the opportunity to secure operation of a T.D.C.J. and which promotes the public welfare. by the reduction of recidivism. Chaplaincy services shall provide to:

- 1,2 Help inmates incorporate religious beliefs and pratices into a process of positive change which promotes public safety, reduces recidivism and promotes the reintegration of inmate(s) in to society.

Signed by Director; Brian Collier

AD-07.30(rev.8) January 18, 2021 RELIGIOUS PROGRAMMING

Authority: Tex. Gov't Code Sec. 493.001, 493.006(b), 493.024, 494.001, 494.002(a), 501.001; Tex. Civ. Prac. & Rem. Code, Sec. 110.001-.012, BP-02.08, Statement of Internal Controls.

Policy: The Texas Department of Criminal Justice [T.D.C.J.] provides inmates oppertunities for religious programming that do not compromise safety, to secure and orderly operation. Participation in religious activities and attendance at [Religious Service] of worship

is strickly voluntary . No T.D.C.J. employee, contractor or volunteer shall disparage the religious beliefs of any inmate or compel any inmate to make a change of faith preference.

Chaplaincy programs and services assist inmates in incorporating religious beleifs and pratices into a process of moral rehabilitation thus reducing recidivism and positively impacting public safety.

DEFINITION

Religious Programming includes: services, meetings, crusades and activities in which inmates may participate. Inmate Request for

Religious Accommodation: (A) All inmate request for religious programs, services or accommodations shall be presented to the chaplain on a [I-60] See: (Exhibit "F"). When the Chaplain recieves the [I-60] he shall (2) Interview the inmate concerning the request.

DISCRIMINATION

1. As seen in (Exhibits "A" & "C") Torah Study or a.k.a Regular Jewish Services for the Plaintiff is always a Christain Service or Christain Band Pratices and allowed Christain Jews called: Messianic or Sabbatorian.
2. Denied Admission to all Jewish Services, and forced him to fast on Chabad Orthodox fasts, not (Reform).

The Defendant(s) have violated Plaintiff's rights according to their own policy and programming by:

- (a) Forcing him to go to Christain based religious programming.
- (b) Denying Plaintiff all religious services, meetings, activities inwhich they stated an inmate may participate in,
- (c) Denied Plaintiff ("help to incorporate his religious beliefs and practices into a process of positive change which promotes public safety, reduces recidivism and promotes the reintegration of inmates(s) in to society as Director Brian Collier stated (defendant).
- (d) Forcing Plaintiff to fast on Orthodox fasts, not Reform.

At no time has the T.D.C.J. Religious Directives or Programming outlined the discrimination or exculsion of the Plaintiff, yet T.D.C.J. Contractor(s) Chaplain Robert K. Hightower and Rabbi Goldstein have done just that as well as all the Defendant(s) who for the past eight and a half (8-1/2) years have denied Plaintiff all religious activities or services as well as meetings and tenets, while allowing non-jews to attend full Jewish Programming and Services. This discrimination has harmed the Plaintiff so severely that he has had to seek psychological help from the Stringfellow Psychologist to help him deal with his pain and sufferings as well as his emotional and mental anguish. Plaintiff has been on antidepressants for the past year and has no other remedy other than to seek the courts help.

A D.N.A. Test would quickly allow the Plaintiff to prove he is Jewish by (Blood) and thus not only proving he is entitled to damages and relief for his pain and years of mental anguish and sufferings, but also prove his entitlement to attend Jewish Religious Services, as permitted by the R.L.U.I.P.A. and the U.S. Constitution's First Amendment which the Defendant(s) have been in violation of for the past years. The Defendant(s) have intentionally and willfully refused to abide by their own policy and programming wherein they could inflict pain and suffering on the Defendant due to his being a political prisoner and for filing civil actions to secure his rights. There is no other reason as to why the Defendant(s) would deny him his Religious rights and simultaneously allow non-jews full Jewish Religious Services and Programming.

The State of Texas being unhappy with the Plaintiff for making YouTube video's exposing Gov. Rick Perry and his Attorney General; Gov. Gregg Abbott for rigging and trumping-up false allegations of retaliation to silence Plaintiff exposing them for collusion with corporate criminals who wanted to cover-up the abduction of Plaintiff's son in exchange for political funding from said corporations during Gov. Perry's bid to become U.S. President in 2012. See: Case No.4:18-cv-645.

FORCED FASTINGS

The Plaintiff(s) are forcing all Jews to fast during many if not all Jewish tenets. However many Jews are not "Orthodox" like Rabbi Dovid Goldstein. Conservative and Reform Jews do not all follow the Orthodox tenets. The only fast that all Jews must recognize is Yom Kippur which is (Torah). All other fasts are Rabbinical. Because Rabbi Goldstein is Orthodox he makes all Jews fast, because (he) fasts and recognizes all the fasts. The Plaintiff and many others now in the Jewish Program are Conservative and Reform. The Plaintiff is not even allowed into Rabbi Goldstein's Jewish Program, but still must fast on all yearly fasts times.

This is the only Rabbinical tenet Plaintiff is not just allowed, but forced to adhere to, even though he is (Reform). The Plaintiff objects to being forced to recognize the [Orthodox] ways and chooses to adhere to his own Ashkenazi Reform tenets which do not recognize "Rabbinical" fasts at all. We should not be forced to fast just because Rabbi Goldstein is Orthodox. The Plaintiff objects to being forced to recognize the Orthodox denomination or adhere to their rabbinical fasts. The Bible does not recognize rabbinical fasts. G-d has never said that Jews must fast, except during Yom Kippur. Rabbi Goldstein forces all Conservative and Reform Jews to eat a cold sandwich after each fast he recognizes. Plaintiff argues he is entitled to a hot meal just like every other inmate at the prison during these fasts. There are approx. six (6) Rabbinical Fasts that are forced on the Reform and Conservative Jews each year by Rabbi Dovid Goldstein and the other Defendant(s). The Plaintiff would ask this Court to order the state to serve Conservative and Reform Jews regular meals during these Orthodox Fasts and not make all Jews suffer for his beliefs. Rabbi Goldstein wants all Jews to be Orthodox Chabad and is forcing his ways on all Jews who do not adhere to such Rabbinical tenets. Reform Jews do not fast on Rabbinical Orthodox Rulings, but adhere to the Bible only. (Torah). Plaintiff seeks relief from forced fastings. See (Exhibit "K").

RELIEF REQUESTED

Wherefore Plaintiff request that the Court grant him the following:

["A" Issue] Religious Exercise, the Substantial Burden sustained and blatantly imposed against the Plaintiff by the Defendant(s) caused him extreme depression, emotional and mental anguish and caused him to seek psychological help for his depression caused by not being allowed to exercise his Religious Freedoms at all. This unjust punishment was sustained by the Defendant(s) for over eight and a half (8-1/2) years. The Defendant (s) intentionally discriminated against the Plaintiff because: (a) He was a political prisoner; (b) he was Jewish and (c) He was filing lawsuits to try and expose their prejudice and Anti-Semitic behavior towards him. The Defendant(s) forced Plaintiff to fight for his rights over and over and blocked him every inch of the way while simultaneously allowing Non-Jews to attend the Jewish Program they denied him, being of Jewish blood, race and practice.

XIII.

The damages were then compounded by the fact the the Plaintiff is an ["Actually Innocent"] who was intentionally wrongfully imprisoned to silence his exposing Texas Governor's Rick Perry and his Attorney General, Texas Governor; Gregg Abbott who were involved in collusion and a cover-up for Corporate criminals who abducted his son, in exchange for political fundings. The Plaintiff seek the sum of:

Seventy Thousand (\$70,000.00) dollars for every year of his incarceration he had to suffer without his rights, and Thirty-Five Thousand (\$35,000.00) dollars for each additional six (6) month period, which to date stands at a Total of Five-Hundred and Ninety-Five Thousand (\$595,000.00) dollars. Compounded [X3] for the cruel and unusual punishments inflicted by adding unjust punishments on top of other punishments, ie "Actual Innocence with the deprivations of all Constitutional rights to obtain justice, and Religious Exercise for that period of time and until such time as the Court ordered remedy.

Compounded by the now; Eight and a half (8-1/2) years already suffered [X3] for a Total of One Million, Seven Hundred and Eighty-Five (\$1,785,000.00) dollars to be added to;

["B" Issue] The discrimination against the Plaintiff to purchase suitable footwear while simultaneously allowing all other Inmates similarly situated to purchase footwear from the outside or outside the prison compound. Plaintiff asks the Defendant(s) to pay an additional Ten Thousand (\$10,000.00) dollars for footwear discrimination etc. A Grand Total of: One Million, Seven-Hundred and Ninety-Five Thousand (\$1,795,000.00) dollars.

IXV.

Additionally the Plaintiff would ask that he be allowed to pay the cost for a D.N.A. Test from Ancestry.com to prove he is Jewish as well as any and all costs associated with obtaining his "lineage" to satisfy any doubts as to plaintiff's entitlement to damages, if said verification is needed or warranted by the Court or Constitution for purposes associated with this civil action etc. and the violations Plaintiff had to suffer both physically and mentally as well as emotionally for the time period said and mentioned, plus overtures. The Defendant(s) all violated Plaintiff's First Amendment to the U.S. Constitution and Federal Statute 42 U.S.C. Section 2000 cc 1 et Seq. Religious Land Use and Institutionalized Persons Act [R.L.U.I.P.A.] as well as Constitutional rights under the Equal Protection Clause of the Fourteenth Amendment of the United States Constitution and the Texas Religious Freedom Restoration Act. Rabbi Goldstein, an Agent of the T.D.C.J. and the State of Texas decision to devise, and implement his own policy in violation of the Plaintiff's Religious rights and to discriminate against the Plaintiff while allowing non-Jews to participate in Religious Jewish Services while denying the Plaintiff all means and ways to obtain his Religious rights and practices. He has used Inmates called Field Ministers (Non-Jewish) to lord over and deny access to the Jewish Program by refusing to order or make Inmate Layins to attend Religious Services. Plaintiff asks that forced fastings stop as they are not recognized.

These type of Inmates were banned during the Ruiz Litigations which caused the Riots in the Texas Prison System and caused many prisoners to lose their lives. T.D.C.J. Policy forbids any Inmate to have control over another Inmates, this would also include his coercing Prison officials to ban him from the Jewish Religious Program and or all Jewish Holy days and Holiday Celebrations, suchas Hanukah etc. It is the Field Minister who schedules Inmate logistics and Jewish Service attendances. (Calvin Small) is a Non-Jew lording over the Jewish Program and scheduling under the Stringfellow unit Chaplain; Chaplain Hightower and Rabbi Goldstein, both who have made sure the Plaintiff is not scheduled to attend any Jewish religious Services. This pratice must stop. At a bare minimum a Inmate should have a right to face his accusers and have them directly dictate T.D.C.J. Policy and it's Administration.

XV.

The Plaintiff ask that the Defendant(s) be held accountable for the punishments and undue harm they inflicted on the Plaintiff who's only wish was to exercise his Constitutional rights to partisipate in Jewish Services and tenets, a R.L.U.I.P.A. and Constitutional right he should have always been allowed to exercise. It is no fault of the Plaintiff that he has no family to help him obtain his lineage, that Rabbi Goldstein maintains he must have before the Plaintiff can attend any Religious services or exercise his Religious tenets, while Rabbi Goldstein's Jewish Program in accommodating Non-Jews. As well a Non Jew is the head cook in the Kosher Kitchen.

The Plaintiff would maintain that if the integrity of the Jewish Program is to be maintained as Rabbi Goldstein seems to want, then all Non-Jews should be excluded, and not Jews who have Jewish blood and by Jewish law have full rights to the Jewish Community. Damages should be ordered for the punishments and damages caused the Plaintiff over the years as well as the Mental and Emotional anguish, duress and the stress compounded by their bias and prejudice while allowing Non-Jews full rights to participate, thus proving bias and discrimination and Anti-Semitism against the Plaintiff for being part Greek and (Reform) not (Orthodox).

Respectively the Plaintiff asks this Honorable Court to award him damages for his eight and a half (8-1/2) years of suffering, and for the cruel and unusual punishments he has been forced to endure both Physically and mentally as well as Religiously. The Plaintiff asserts he has been irrefutably harmed by the cruel and unusual discriminations and bias toward him by a perported Religious Rabbi who allows Non-Jews access to a Jewish Religious Program but lords over Jews he does not like due to their origin or Jewish Preferences who have absolute rights to attend. The Defendant's are guilty of years of discrimination against the Plaintiff and should pay full restitution and damages as allowed by this Court.

Respectfully submitted,


Michael G. Peters #2019190

Dated: January 20th, 2023.

MICHAEL GEOFFREY PETERS NO. 2019190
STRINGFELLOW UNIT
1200 FM 655
ROSHARON, TEXAS 77583

(281) 595-3413

EVIDENCE AND EXHIBITS

EXHIBIT "A"

Exhibit "A" is a prison layin to attend Jweish Torah Lessons. It is the only event I was allowed to attend. I had to file a civil action against the state and their agent; Rabbi Goldstein for refusing my Jewish Religious Services, Fifth Circuit No.20-20612 & 21-20444. When Rabbi Goldstein heard of the civil action he kicked me out of Torah Lessons in retaliation, upon doing this I filed a prison grievance and was then allowed Torah Lessons against, See: Exhibit "B". I was segregated and by myself. Also See: Exhibit "C".

I filed another civil action for [Retaliation], No. 21-40483. All Civil Actions being dismissed for non-payment etc. Later the State and it's Administrative Inmate (Calvin Small) allowed Christain Inmates to attend my Torah Lessions and this made me uncomfortable as I am jewish and we do not believe in Jessus Christ as the Messiah and therefore cannot interact, thus denying me all avenues to any type of religious tenet or community.

EXHIBIT "D" AND "E"

Show prior prison grievances, which the state and T.D.C.J. have refused to answer. The Stringfellow Unit Grievance Department is refusing to comply with their Grievance Procedures and Policies.

EXHIBITS NO. "F" AND "G"

On December 14, 2022 as I do every year I wrote an ("I-60") Prison Request to attend Religious Services and Holy Days. Once against I was denied and filed another grievance ("G"). Again I await their response, but expect none as usual. They know they are in violation of my First and Eighth Amendment rights as well as my R.L.U.I.P.A. rights and choose to ignore my complaints and grievances.

EXHIBIT NO. "H"

Plaintiff has been diligently trying to obtain his Jewish lineage. However he has no ways or means to do so. Plaintiff's Grandmother; Anna Theodore is from Belarus, City of Minsk where many Askkenazi Jews are from. She married a Greek Orthodox; Michael Theodore, but her jewish blood is also Plaintiff's blood. An Ancestry.com D.N.A. Test will easily prove that. Outside this fact, the Plaintiff has or should have had R.L.U.I.P.A. and Constitutional rights to practice his religion, which the Defendant(s) all denied.

OFFICIAL LAYIN PASS
ADMINISTRATIVE

"A"

EFFECTIVE DATE: 10/21/2020
FROM-TO TIME: 10:30-11:15
START DATE: 10/21/2020 END DATE: 10/21/2020

ADMIT: 02019190 PETERS, MICHAEL GEOFFREY
REASON: TORAH STUDY HOUSE: C15-1-08B

JOB: I/S MED SQ 8 06:00-14:00
EDUC:

COUNTROOM: VILLARREAL

TITLE: AAII

*told I could not
ATTEND*

INSTITUTIONAL DIVISION

TDCJ - INSTITUTIONAL DIVISION
OFFICIAL LAYIN PASS
ADMINISTRATIVE

"C"

EFFECTIVE DATE: 10/28/2020
FROM-TO TIME: 10:30-11:15
START DATE: 10/28/2020 END DATE: 10/28/2020
15:30 - 14:30

ADMIT: 02019190 PETERS, MICHAEL GEOFFREY
REASON: TORAH STUDY HOUSE: C13-2-19B

JOB: I/S MED SQ 1 1ST 00:00-00:00
EDUC:

COUNTROOM: VILLARREAL

TITLE: AAII

*Changed Torah timer to segregate me after
filing of civil action*

October 25, 2020

To: Captain Jones
From: Michael G. Peters
Cell: C13-219-B
TDCJH 2019190

"B"

Hey Captain Jones

I've a problem, I should bring to your attention. I've filed a civil action against Robb Goldstein for refusing me religious services, when I did he retaliated and kicked me out of Torah lessons according to the Chapter who told me.

His Gang is now threatening me, I've been ex-communicated, not that I care, but I know Mitchell who lives a couple houses ~~from~~ from me told Lorenzio in C15 he was going to start giving me less food.



STEP 1 OFFENDER GRIEVANCE FORM

OFFICE USE ONLY

Grievance #: _____

Date Received: D

Date Due: _____

Grievance Code: _____

Investigator ID #: _____

Extension Date: _____

Date Retd to Offender: _____

Offender Name: Michael G. Peters TDCJ # 2019190

Unit: Springtown Housing Assignment: B-12-18

Unit where incident occurred: Springtown Unit

You must try to resolve your problem with a staff member before you submit a formal complaint. The only exception is when appealing the results of a disciplinary hearing.

Who did you talk to (name, title)? Rabbi Goldstein When? Oct 27, 2020

What was their response? No response

What action was taken? No action taken

State your grievance in the space provided. Please state who, what, when, where and the disciplinary case number if appropriate

Rabbi Goldstein is Antisemitic against any Jew who can not prove his lineage or convert. While all other Jews can participate in Chanukah Celebrations and eat special meals prepared for the holiday, Jews who cannot readily prove their lineage cannot celebrate. While Christians all have holiday meals and Jews with lineage, I am being denied Chanukah Celebrations. Rabbi Goldstein is prejudice against Greek Jews because of events which happened around 333 BC wherein Greek philosophies differed from mainstream Judaism. While things have greatly changed over 1627 years, today's Orthodox Greeks adhere to the same traditions and ~~beliefs~~ beliefs. However prejudice is difficult to overcome for Rabbi Goldstein and his Group of Chabad. This bias and prejudice behavior is malicious and aimed at punishing Jews who cannot prove their lineage. This Rabbi is Anti-Torch and does not practice Judaism as the Torah teaches us to love our neighbor and Rabbi Goldstein is clearly prejudice and seeks only to create ill will with his Jewish brothers. T.D.C.J. should act to correct its staff from being bias and prejudice against

others. He is not supposed be prejudice. Chonukh cel-
 ibration started December 11th thru 18th yet I was not
 allowed to celebrate our freedom and gods blessing to
 his people because Rabbi Goldstein is selfish and inconsiderate
 towards others (his neighbors) all converts and all Jews
 without strict documentation. It took Israel Oliver
 Lister (17) years to get his lineage, yet all the time he
 was Jewish. All Jews fast at Chagim, but if Christians
 can celebrate, so should undocumented Jews.

Action Requested to resolve your Complaint.

Stop Religious prejudice and bias

Offender Signature:

Michael H. Peter

Date: 12-25-2020

Grievance Response:

Signature Authority:

Date:

If you are dissatisfied with the Step 1 response, you may submit a Step 2 (I-128) to the Unit Grievance Investigator within 15 days from the date of the Step 1 response. State the reason for appeal on the Step 2 Form.

Returned because: *Resubmit this form when the corrections are made.

- ☐ 1. Grievable time period has expired.
- ☐ 2. Submission in excess of 1 every 7 days. *
- ☐ 3. Originals not submitted. *
- ☐ 4. Inappropriate/Excessive attachments. *
- ☐ 5. No documented attempt at informal resolution. *
- ☐ 6. No requested relief is stated. *
- ☐ 7. Malicious use of vulgar, indecent, or physically threatening language. *
- ☐ 8. The issue presented is not grievable.
- ☐ 9. Redundant, Refer to grievance # _____
- ☐ 10. Illegible/Incomprehensible. *
- ☐ 11. Inappropriate. *

UGI Printed Name/Signature: _____

Application of the screening criteria for this grievance is not expected to adversely affect the offender's health.

Medical Signature Authority: _____

I-127 Back (Revised 11-2010)

OFFICE USE ONLY

Initial Submission UGI Initials: _____
 Grievance #: _____
 Screening Criteria Used: _____
 Date Recd from Offender: _____
 Date Returned to Offender: _____
 2nd Submission UGI Initials: _____
 Grievance #: _____
 Screening Criteria Used: _____
 Date Recd from Offender: _____
 Date Returned to Offender: _____
 3rd Submission UGI Initials: _____
 Grievance #: _____
 Screening Criteria Used: _____
 Date Recd from Offender: _____
 Date Returned to Offender: _____



Texas Department of Criminal Justice

STEP 2

OFFENDER
GRIEVANCE FORM

Offender Name: Michael G. Peters TDCJ # 2019190
 Unit: Stringfellow Housing Assignment: C13-2-19B
 Unit where incident occurred: Stringfellow

OFFICE USE ONLY

Grievance #: 11 67
 UGI Recd Date: E
 HQ Recd Date: E
 Date Due: _____
 Grievance Code: _____
 Investigator ID#: _____
 Extension Date: _____

You must attach the completed Step 1 Grievance that has been signed by the Warden for your Step 2 appeal to be accepted. You may not appeal to Step 2 with a Step 1 that has been returned unprocessed.

Give reason for appeal (Be Specific). I am dissatisfied with the response at Step 1 because...

Warden Hayes is extremely confused as her answer in my STEP 1 suggests. At no time have I ever been Lzyed-in or given a pass to attend Jewish services. Due to my 1st lawsuit, I'm here due to kosher meals only. Religious services pertaining to my religious beliefs in Judaism have been denied me since my arrest on July 17, 2014, in violation of my First Amendment rights. Since my arrest I have made it know to officials that I am Jewish. Judaism is our way of life. G-d has instructed us to abide by his commandments, in Torah which is the five(s) book of Moses, it commands us to celebrate certain holidays and observe them by such observances, tests, services, prayers and religious practices. While I am allowed to attend Torah Studies; that has nothing to do with Services. I'm being denied denied my observances to Torah, cut off from ceremonies, prayers and communion in violation of my freedom to exercise my religious beliefs, contrary to my First Amend. rights. Whether or not Rabbi Goldstein approves or not or any Institution proves my linnage

The First Amendment guarantees my right exercise my religious beliefs. Refusing me services before, during or after the COVID-19 virus threat has nothing to do with your refusal refusing me services before the virus as you intend to depose the threat of virus is removed.

Offender Signature: Michael L. ListerDate: Nov. 16, 2020

Grievance Response:

Signature Authority: _____ Date: _____

Returned because: *Resubmit this form when corrections are made.

- ☐ 1. Grievable time period has expired.
- ☐ 2. Illegible/Incomprehensible.*
- ☐ 3. Originals not submitted. *
- ☐ 4. Inappropriate/Excessive attachments.*
- ☐ 5. Malicious use of vulgar, indecent, or physically threatening language.
- ☐ 6. Inappropriate.*

CGO Staff Signature: _____

OFFICE USE ONLY**Initial Submission**

CGO Initials: _____

Date UGI Recd: _____

Date CGO Recd: _____

(check one) ☐ Screened ☐ Improperly Submitted

Comments: _____

Date Returned to Offender: _____

2nd Submission

CGO Initials: _____

Date UGI Recd: _____

Date CGO Recd: _____

(check one) ☐ Screened ☐ Improperly Submitted

Comments: _____

Date Returned to Offender: _____

3rd Submission

CGO Initials: _____

Date UGI Recd: _____

Date CGO Recd: _____

(check one) ☐ Screened ☐ Improperly Submitted

Comments: _____

Date Returned to Offender: _____

TEXAS DEPARTMENT OF CRIMINAL JUSTICE — INSTITUTIONAL DIVISION

INMATE REQUEST TO OFFICIAL

REASON FOR REQUEST: (Please check one)

PLEASE ABIDE BY THE FOLLOWING CHANNELS OF COMMUNICATION. THIS WILL SAVE TIME, GET YOUR REQUEST TO THE PROPER PERSON, AND GET AN ANSWER TO YOU MORE QUICKLY.

- | | |
|--|---|
| <p>1. <input type="checkbox"/> Unit Assignment, Transfer (Chairman of Classification, Administration Building)</p> <p>2. <input type="checkbox"/> Restoration of Lost overtime (Unit Warden-if approved, it will be forwarded to the State Disciplinary Committee)</p> <p>3. <input type="checkbox"/> Request for Promotion in Class or to Trusty Class (Unit Warden- if approved, will be forwarded to the Director of Classification)</p> <p>4. <input type="checkbox"/> Clemency-Pardon, parole, early out-mandatory supervision (Board of Pardons and Paroles, 8610 Shoal Creek Blvd. Austin, Texas 78757)</p> | <p>5. <input type="checkbox"/> Visiting List (Asst. Director of classification, Administration Building)</p> <p>6. <input type="checkbox"/> Parole requirements and related information (Unit Parole Counselor)</p> <p>7. <input type="checkbox"/> Inmate Prison Record (Request for copy of record, information on parole eligibility, discharge date, detainers-Unit Administration)</p> <p>8. <input type="checkbox"/> Personal Interview with a representative of an outside agency (Treatment Division, Administration Building)</p> |
|--|---|

TO: Stringfellow Unit Chaplin

(Name and title of official)

DATE: December 14, 2022ADDRESS: Stringfellow Unit

SUBJECT: State briefly the problem on which you desire assistance.

Dear Stringfellow Unit Chaplin [Hightower]

I request to be laid in for Friday Jewish Evening and all other annual Holy Day Services, accordingly per the T.D.C.J. FD-07.29 and AD-07.00 Religious Policy Directives beginning with Chanukah on 12-18-22.

Many thanksMichael G. PetersName: Michael G. PetersNo: 2019190Unit: StringfellowLiving Quarters: A-04-08Work Assignment: med.

DISPOSITION: (Inmate will not write in this space)



Texas Department of Criminal Justice

STEP 1

OFFENDER
GRIEVANCE FORM

OFFICE USE ONLY

Grievance #: 11Date Received: GDate Due: G

Grievance Code: _____

Investigator ID #: _____

Extension Date: _____

Date Retd to Offender: _____

Offender Name: Michael G. Peters TDCJ # 2019190Unit: Stringfellow Housing Assignment: A-04-08Unit where incident occurred: Stringfellow Chapel

You must try to resolve your problem with a staff member before you submit a formal complaint. The only exception is when appealing the results of a disciplinary hearing.

Who did you talk to (name, title)? Chaplin Hightower When? 12-14-2022What was their response? Stated he would take care of the problemWhat action was taken? He did nothing

State your grievance in the space provided. Please state who, what, when, where and the disciplinary case number if appropriate

I have had Jewish on my travel card since I enter TDCJ eight and a half (8-1/2) years ago, but have been refused religious services. I am Jewish by blood. I filed this Step (1) to grieve the continual abridgements and violations of my constitutional right to "Free Exercise of Religion(s)" matters which has continued to create a substantial burden to practice my jewish tenants in further violation of VaS.Ce 42 Section 2000 et al seq. [R.L.U.I.P.A.] statute, as follows: On December 14, 2022 I submitted an (I-60) to the Unit Chaplin; Mr. Hightower to be scheduled for accommodation accordingly for Chanukkah Services and I hand delivered the (I-60) directly to Chaplin Hightower and was informed by him that he would handle it. I assert when Chanukkah began on December 18, 2022 that evening and continued threw December 25, 2022 that evening, I was not scheduled or accommodated for services. This is contrary to ED-07.29, Religious Policy Statement and AD-07.30, Religious Programming. I also believe I was tainted by Field Minister, Calvin Smalls indifference towards me and his implied bias against me with the Chaplin to deny me services. The AD-03.02, "Impermissible Inmate Conduct" and PD-22 General Rules of Conduct for Cenh.J. employees prohibits unit officers from allowing inmates, to hold authority over disciplin other inmates, et al. This is a pattern of practice on the Stringfellow Unit and has created various problems. The Practice of Administrative inmates [Turnkeys] to lord over inmates was outlawed by the "Ruiz" litigations, thus AD-03.02 Impermissible Inmate Conduct / PD-22 Rule violations.

Action Requested to resolve your Complaint.

Offender Signature: _____ Date: _____

Grievance Response:

Signature Authority: _____ Date: _____

If you are dissatisfied with the Step 1 response, you may submit a Step 2 (I-128) to the Unit Grievance Investigator within 15 days from the date of the Step 1 response. State the reason for appeal on the Step 2 Form.

Returned because: *Resubmit this form when the corrections are made.

- ☐ 1. Grievable time period has expired.
- ☐ 2. Submission in excess of 1 every 7 days. *
- ☐ 3. Originals not submitted. *
- ☐ 4. Inappropriate/Excessive attachments. *
- ☐ 5. No documented attempt at informal resolution. *
- ☐ 6. No requested relief is stated. *
- ☐ 7. Malicious use of vulgar, indecent, or physically threatening language. *
- ☐ 8. The issue presented is not grievable.
- ☐ 9. Redundant, Refer to grievance # _____
- ☐ 10. Illegible/Incomprehensible. *
- ☐ 11. Inappropriate. *

UGI Printed Name/Signature: _____

Application of the screening criteria for this grievance is not expected to adversely affect the offender's health.

Medical Signature Authority: _____

I-127 Back (Revised 11-2010)

OFFICE USE ONLY

Initial Submission UGI Initials: _____
 Grievance #: _____
 Screening Criteria Used: _____
 Date Recd from Offender: _____
 Date Returned to Offender: _____
 2nd Submission UGI Initials: _____
 Grievance #: _____
 Screening Criteria Used: _____
 Date Recd from Offender: _____
 Date Returned to Offender: _____
 3rd Submission UGI Initials: _____
 Grievance #: _____
 Screening Criteria Used: _____
 Date Recd from Offender: _____
 Date Returned to Offender: _____



*The Jacob Rader Marcus Center
of the*
AMERICAN JEWISH ARCHIVES

Dear Michael G. Peters,

I'm afraid I was unable to find any evidence about your Jewish ancestry. While I was able to confirm your grandmother Anna was from Russia, but not where in Russia. And while I did learn her maiden name was Littlekon or Littlekoon, I couldn't figure out if that was a Jewish last name.

I would suggest doing further research on Anna, starting by doing two things. The first is order Anna's social security application, or SS-5. This would cost \$30, but it can help by telling you her parents' names and, if you're lucky, where specifically she was born. I managed to locate Anna's social security number, meaning it shouldn't be too difficult for them to find it for you. You can order the application through this link: <https://www.ssa.gov/foia/request.html>

I would also suggest looking into getting Anna's marriage record to Mike Theodore. I found an index record that says they were married in Cass County, Minnesota on April 22, 1915, but I don't have the marriage record itself. For that, you would have to go to the website <https://moms.mn.gov/Search> and request a copy. It will cost about 10 dollars, but it could be an important clue. Not only should it mention who her parents were, it should also reveal who married them and where they were married. This would help you figure out their religion, and if the particular church or congregation still exists then you can contacting and see if they can tell you anything else.

Lastly, I'm also giving you census records for the Theodore family from 1920 to 1940, Anna's obituary, and information about her burial in Phoenix. Even if they don't directly say anything about Anna's possible Jewish heritage, it might be interesting for you to see.

Good luck with your research!

Sincerely,

Jacob Heisler
Archival Assistant
The Jacob Rader Marcus Center
of the American Jewish Archives
3101 Clifton Ave.,
Cincinnati, OH 45220
513-487-3044

I Z-60
To: Administration

message:

From: Michael G. Peter

#2019190

A-4-8

I have no relatives or
people to buy me tennis
shoes. How can I pur-
chase a pair? I wear

size 12D

Thanks

The T.D.C.J. Commissary does not sale size (12-D) tennis shoes and thus the reason why Plaintiff had to ask the Stringfellow Unit Administrator to help him. The Administrator knew by the message she was answering that she was in fact just ignoring his request for shoes and the purchase there of.

This type of total disregard to inmates requests is typical at the Stringfellow Unit. They know the Plaintiff and they also know he is a Political Prisoner as they continue to steal all his out-going mail to any Media or Attorney. This has be the sorce of many a civil action all ignored by GOP Members in the judiciary who support Gov. Rick Perry and Gov. Gregg Abbott whom the Plaintiff was exposing.

The Stringfellow abused her position as the Unit Administrator to use ("Deliberate Indifference") against the Plaintiff and refused to take the necessary time to investigate. This is typical abuse used by T.D.C.J. staff to discourage inmates from seeking their rights or asking for equal treatment and the way in which all Inmate Grievances are answered at the Unit Level.



Rabbi & Mrs. Dovid Goldstein

Chabad Outreach

11000 Fondren Rd Ste B-104 • Houston, TX 77096 • 713.774.0300

Rabbi Moishe Traxler, Director
 Rabbi Dovid Goldstein, Jewish Inmate Services Director
 Rabbi Mendel Traxler, Program Director
 Mrs. Shoshana Traxler, Director Jumbo Judaica

Jewish Inmate Services Texas
 Living Legacy
 Jewish Learning Institute
 Jumbo Judaica of Houston

chabadoutreach.org
 jewishinmates.com
 chabadoutreach.org/LivingLegacy
 chabadoutreach.org/JLI
 jumbojudaica.org

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The Defendant Dovid Goldstein boast being the Jewish Inmate Service Director for Jewish Inmate Services of Texas and is the T.D. C.J. Contractor who ignored and prohibited the Plaintiff from attending all Jewish Religious Services for the past eight and a half (8-1/2/) years. He is the mediator T.D.C.J uses to punish those they seek to cause harm for being a State Whistle Blower and/or Writ Writer.

He heartily disregarded all Plaintiff's request to attend Jewish Religious Services, while allowing Non-Jews to attend, thus proving his discrimination and willingness to subject the Plaintiff to both mental and emotional harm.

For the past eight and a half (8-1/2) years the Defendant has made the Plaintiff's life "hell" by completely disregarding his rights to Religious Services and practicing his religious tenets. His refusal to help or aid the Plaintiff prove his lineage or obtain a D.N.A. test to prove he was Jewish, proved his prejudice towards the Plaintiff and his inability to provide Jewish Inmate Services.

A simple D.N.A. Test would quickly prove the Plaintiff is Jewish by blood. The Plaintiff is also circumcised which all Jewish males must be. What good is an ("Outreach") Program, if they refuse to reachout and help a Jew obtain his proof of lineage, when he himself demands the Plaintiff obtain it?

He allows many Non-Jews to participate in his Jewish Program, for which T.D.C.J. pays him a salary for, yet he refuses to help an incarcerated prisoner prove his lineage wherein he may practice his Jewish Religion and Tenets. The harm he has caused to Plaintiff over the past eight and a half (8-1/2/) years has severely impacted the Plaintiff and made him suffer at his greatest time of need. He did this to harm the Plaintiff and worked with other T.D.C.J. employee's to prevent Plaintiff from practicing his religion. He uses "Administrative Inmates" called Field Ministers as a go between to deny those inmates he does not want in the program attendance. This Field Minister Calvin Small is a Non-Jew and has never been converted.

Dovid Goldstein is a T.D.J.C. ("Yes Man") who does what they ask him to do. He has caused harm to many a Jewish prisoner by ignoring them and disallowing them into the Jewish Community and Program. Many Jews have had to complain to the Aleph Institute about his abuses and refusal to induct them into the Program for Services.

COPY OF THE I-60 / GRIEVANCE

Michael G. Peters
Stringfellow

2019190

A-04-08

Chaplain Robert K. Hightower
Ignored me
Refused to take any action

12-18-2022

The Grievant wrote an (I-60) to Chaplain Hightower who by T.D.C.J. Religious Programming Policy No. AD-07.30 was supposed to interview me and talk about the problem, but he refused to. Since I have been on the Stringfellow Unit for ["Kosher Meals"] I have been forced to observe Rabbi Goldstein's Orthodox Chabad religious tenets. I am a Askenic [Reform] Jew, not a Chabad Orthodox Jew. While Rabbi Goldstein observes (all) Jewish Fasts, Reform and Conservative Jews do not. All fasts except Yom Kippur are "Rabbinical" and not required by Torah (Bible). AD-07.30(rev.8) states: [No T.D.C.J. employee, contractor or volunteer shall disparage the religious beliefs of any inmate "or compel and inmate to make a change of faith preferences." The fasting on Jewish (Orthodox) fast is directly against the Jewish [Reform] faith preferences. I have been forced to fast on six-seven (6-7) fasts that are unsupported by the Bible (Torah). Only the Orthodox and some Conservative Jews recognize all the fasts. Every Jew must recognize Yom Kippur's fast by Torah. I would like hot meals during every other fast, just like everyone else at the Stringfellow Unit. Rabbi Goldstein does not have the right to impose ("his") Jewish beliefs on all Jews. Most people in the Jewish Program are not members of Chabad denomination and therefore would not observe (Rabbinical fasts). I would like regular (hot meals) during these fasts and do not wish to be forced to become a member of the Chabad denomination or follow their customs. I am an Askenazic Reform Jew, not a Chabadic.

I would like T.D.C.J. to abide by their Program
Policies and stop forcing all Jews to fasts on Orthodox Rabbinical Fasts.

Michael G. Pitzer

01-09-2023

Michael G. Peters #2019190
Stingfellow Unit
1200 FM 655
Rosharon, Texas 77583

U.S. Northern District Court
C/O The Clerk's office
1100 Commerce Street
Dallas, Texas 75242

RE: JURISDICTION

Dear Court Clerk

I want to file a Religious Freedom civil action. I am a Political Prisoner who's been conspired against by the GOP and it's members because I was exposing Gov. Rick Perry and his Attorney General; Gregg Abbott in 2012 for being in collusion with Houston based Corporations who bribed them to cover-up abducting my son by fabricating his medical records to deceive a District Court judge.

These crimes involve RICO Anti-SLAPP, Collusion, Child Abduction, Agg. Perjury, Physical Evidence Fabrication, Jury Rigging, Trial Rigging, Conspiracy, Thefts and many more.

I was arrested in Del Rio and extradited to Montgomery County by members of this conspiracy and cover-ups. Part of the damages I am seeking entails compound injuries, due to constitutional rights deprivations. I have been accused of filing (frivolous civil actions) by Houston based Republican Party judges who have taken bribes by these billion dollar corporations and are stopping me from filing civil action. The three-strikes were imposed by corrupt judges as all civil actions filed are backed by evidence these judges are covering-up. I want a Hearing to Present this evidence, but because I am a Political Prisoner, the State's Politicians have total control of me and have stopped my contacting Media and Lawyers to obtain help.

This is a very unusual case in that I am "Actually Innocent" and have all the evidence to prove that, but again the GOP is using it's judges to cover-up GOP crimes and involvement.

I cannot present this evidence as I am being controled by state politicians and state prison officials. I have filed numerous civil actions, but am being denied any hearings by those involved in this GOP cover-up.

I need to have a Hearing to present this evidence. GOP members from Houston, Texas wherein these Corporations have control of the courts have used Houston judges like David Hittner in the U.S. Southern District Court and Houston, Judge Gregg Acosta in the Fifth Circuit. Actual Innocence cannot be covered-up, but they did it by neglect etc. Not once have these courts ever considered this evidence even though they all had it.

I had Texas Attorney General; Ken Paxton call me here at the String-fellow Unit to tell me to drop my criminal complaints against these Corporations.....

It's rather difficult for even an innocent person to find justice when the courts are corrupted by Corporate money and Political Ambition. Gov. Gregg Abbott wants to run for U.S. President as Rick Perry did and thus must continue to keep me silenced by the denial of all my constitutional rights and trial rigging.

My case never made it to a Supreme Court judge as Republican Clerk Scott Harris withheld my Certiorari until it was time barred then informed me it was dismissed. I have refiled in your court. Judge David Horan transfered it to Houston November 14, 2022, since that time the Southern Disrtict Court has not even acknowledge receipt of this transfer. This is typical of this cover-up, they do not want me to file motions or know that it was probably assigned to Judge David Hittner again to cover-up once again.

I am pleading for help as I have never been represented by a Lawyer who was not part of this conspiracy and cover-up. I have tried to report it to the FBI and CIA to no avail. I am unable to fight a Politically motivated criminal conspiracy by the GOP and it's members, who is?

As I said I have all this evidence and can prove:

1. The Corporate Crimes being covered-up.
2. My Actual Innocence
3. The State's involenments in this cover-up.
4. The total denial of all my constitutioanl rights.

This is a continued and sustanied cover-up for RICO-Anti-SLAPP crimes and Conspiracy by the State and it's Politicans. I would like the one chance to support what I am saying with the evidence and facts. Can you give this to a judge who is not a Republican?

I am very concerned that the Southern District Court will simply withhold my criminal case until it's time barred or dismissed as they are involved in the cover-up of my Actual Innocence and Corporate Crimes.

Once again I am a Political Prisoner.....I am unable to contact the Media or Lawyers and have filed un to (70) civil actions seeking to file on those who are stopping me from exposing their crimes. Not one is frivolous as I have all the evidence.....I just cannot present it when Federal Judge's of the GOP are involved in it's total cover-up. Due to the serious nature of these crimes and the extend of it's cover-ups which include Supreme Court Clerk; Scott Harris, I plead with this Court to allow me to have one (1) Hearing to present the evidence the GOP has been involved in covering up, using State Government and Federal Courts to do it.

Again I am sorry I am just a Layman as most would be who have ever experienced a GOP based RICO Crimes cover-up using State Government and Federal Courts to protect the GOP's Political Canidates from being exposed for RICO Anti-SLAPP Crimes, Conspiracy, Child Abduction etc. Most evidence is already in the courts, but new evidence of Ken Paxton calling me in a scheduled prisoner phone call to ask me to drop my criminal complaints exposing said Corporate Criminals supporting the GOP's Presidential Canidates, ie Rick Perry and Gregg Abbott. My YouTube Video's exposing Rick Perry is the reason why State Politican's from the GOP have had me silenced by rigging a trial in a closed door court room and disallowing me all evidence and witness subpoenas to presnet my own defense and expose them. I was given (35) years by a jury who did not even know the trial was one sided and rigged. I was never allowed to make any Jury Selections. Or submit evidence, subpoena defense witnesses proving said Corporate crimes, while the State's witness was the Corporate Criminal who abducted my son and lied to the Judge by faxing her fabercated physical evidence.

I pray for justice and one (1) chance to show this Court this evidence. I will not ask for more, but should be entitled to at least present the evidence of a National GOP Criminal Cover-up. This affects all Americans and all seeking justice in this country.

Respectfully Yours



Michael G. Peters / Political Prisoner

Dated: January 23, 2023

cc: File

United States District Court
Southern District of Texas

ENTERED

March 21, 2022

Nathan Ochsner, Clerk

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

MICHAEL G. PETERS and D.G.P.,

Plaintiffs,

v.

TEXAS MEDICAL BOARD,

Defendant.

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CIVIL ACTION NO. H-22-0059

PRECLUSION ORDER

Michael G. Peters (TDCJ # 02019190) is an inmate in the Texas Department of Criminal Justice. He is a frequent filer and has had at least 15 cases dismissed as frivolous or for failure to state a claim on which relief can be granted. In light of Peters's extensive history of frivolous and abusive litigation, Peters is **precluded** from filing any new case in this District unless he first obtains written permission from a Judge of this District.

SIGNED on March 21, 2022, at Houston, Texas.



Lee H. Rosenthal
Chief United States District Judge

Michael G. Peters #2019190
Stringfellow Unit
1200 FM 655
Rosharon, Texas 77583



U.S. Northern Dist. Court
Court Clerk
1100 Commerce Street
Dallas, Texas 75242

January 23, 2023

Dear Court Clerk

I am asking that this case be heard in this jurisdiction as said in the other inclosed correspondence a criminal conspiracy is at foot due to said political criminal cover-up. I have sent the U.S. Southern Dist. Court a check for the filing fee of Four Hundred Dollars (\$400.00), they do not want to hear this case and are part of a criminal conspiracy to cover-up all evidence leading to the GOP's RICO Crimes involving Rick Perry and Gov. Gregg Abbott who in 2012 was Perry's AG. This criminal cover-up intails why the three-strikes were imposed by it's GOP Members.

That said I await the response of the U.S. Southern Dist. Court who rejected this case. I have asked for said permission but do not want or expect it. I would like this Court to take this case to remove it from this decade old RICO- Anti-SLAPP Crimes cover-up based out of HGouston, protecting Baylor College of Medicine and Texas Children's Hospital Corporate Criminals who have reason to and motive to bribe Houston's Federal judges to stop a 3.3 Billion Dollar liable suit. It's this evidence I wish to present to this court along with this Religious Freedom deprivation civil action to punish me for exposing Rick Perry and Gregg Abbott, both who have ambitions to become U.S. President.

Again that said I need time to have the U.S. Southern Dist. Court send back the filing fee wherein I can resend it to you. Or can they simply transer it to you? This is really what I need to know. I am a Political Prisoner who's being conspired against and re-fued justice or a Hearing to presnt said evidence and facts.

Please advise. Inclosed is the regenerated civil action. I have the money to pay and hope the U.S. Southern Dist. will transfer to you, if not let me know and I will have TDCJ send it directly to you after it's returned.

Michael G. Peters

Michael G. Peters #2019190
Rosharon, Texas 77583

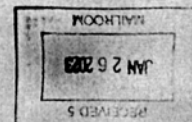
CERTIFIED MAIL



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U.S. NORTHERN DISTRICT COURT
C/O The Clerk's Office
1100 Commerce Street
Dallas, Texas 75242



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Legal Mail

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